

THE LAW OFFICES OF SEAN M. MAHER, PLLC

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April 6, 2021

VIA ECF

Hon. Laura Taylor Swain  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Claudiu Vaduva*, S4 19 Cr. 651 (LTS)  
Supplemental sentencing submission on behalf of Claudiu Vaduva and  
request to remove Doc. No. 553-1 from the public docket

Dear Judge Swain:

On behalf of defendant Claudiu Vaduva, please accept the attached defense sentencing exhibits 1-4 to replace exhibits 1-4 as found in Doc. No. 553-1 (filed on 3/26/2021). This new set of exhibits remedies a redaction error in the previously filed exhibits. I also respectfully request that the Court direct the Clerk of Court to remove the previously filed Doc. No. 553-1 from the public docket.

The request is granted. The Clerk of Court is respectfully directed to remove DE #553-1 from public view on the docket, making it accessible by Court personnel only. DE# 576 resolved.  
SO ORDERED.

4/7/2021

/s/ Laura Taylor Swain, USDJ

cc: All counsel via ECF

Respectfully submitted,

\_\_\_\_\_  
/S/  
Sean M. Maher

# Exhibit 1

Mr Judge Swain,

My name is Amalia Vaduva , I have 30 years, I was born in Craiova, Romania and I am Vaduva Claudiu Marian's wife.

We met in 2017 and got married after 6 monts. It was love at first sight and honestly I don't know what I would do without him. We have a little boy of 2 years and 7 months, named [REDACTED]. Claudiu is the perfect father for our boy, he is thoughtfull, loving, carefull and he wanted very much to have a child.

My husband is a very special person for me, he spoils me every day and he is my rock. He doesn't have any vices and always helps people around him. He supports me moraly every day, even we didn't saw each other for a very long time and things are very hard for us right now, so I beg you to have a mercifull attitude towards him. I miss him day and night and I can't wait for his return. He needs to be with his family, with his boy and in his home.

Since he was taken, everything feels different and senseless. He missed [REDACTED] firsts steps, firsts words and most importantly, [REDACTED] misses his father. Every time I show him a picture of his father, he sighs and gets very sad; it breaks my heart to see my sweet, little boy hurting like this. He is innocent and doesn't understant why his father isn't here with us. If i could, I will give my life just to see them both happy and safe. Me and my husband feel like our lives are on pause and only dream at the day we will be together again. So please, take his family into consideration and give him an easy sentence.

Kindly,

Amalia vaduva

Date

21.3.2021

Signature

## Exhibit 2

Mr Judge Swain,

Undersigned Nita Silviu Gabriel, I was born in Craiova, Romania and I know Claudiu since 3 years ago, since he got married with my sister, Amalia Vaduva.

He is polite, kind and very civilized. Every time I asked for his help he was there for me, for example, when I got a flat tire, he came to help me, although it was late at night.

Claudiu have a child with my sister, a sweet little boy named [REDACTED] and I know he is very carefull with him and always spoiles him. We get along very well and I know he doesn't consume alcohol, he doesn't smoke and he likes to have a healthy life style.

For him, his family is the most important thing in the world and I ask you kindly to take this into consideration when you give him his sentence. He doesn't deserve to endure this pain and he really wants to be with his family.

Thank you mery much!

Date

21.3.2021

Signature

## Exhibit 3

Mr. Judge Swain,

Undersigned Pelea Madalina, born in Craiova, Romania, as Claudiu Marian Vaduva's soon to be sister in law, I know him since 3 years ago, when he got married with Amalia.

From my point of view, Claudiu have a positive attitude, he always have a smile on his face, he is funny and very close to his family. I remember when I moved with my fiance that he offered himself to help us move and he even stayed very late with us, untill we finished packing.

Claudiu didn't saw his child for a very long time, and he misses him very much; he has been apart from as for too long and we are all thinking at the day when will be reunited again.

Please take into consideration the suffering of the family and give him an easy sentence.

Thank you very much!

Date

20.03.2021

## Exhibit 4





## UNITED STATES GOVERNMENT MEMORANDUM

Metropolitan Correctional Center, New York, New York

**DATE:** March 6, 2021  
**FROM:** M. Charles / Food Service Cook Supervisor  
**SUBJECT:** VADUVA #87794-054

To whom it may concern:

This is to confirm that Inmate VADUVA #87794-054 has been working in the food service department from JULY 2020 to present. Vaduva has held many positions in the kitchen such as: sanitation, lead prep cook, and cook for the entire population. Inmate Vaduva has been assigned to various duties and also helps out doing the following: butcher, baker, dining, sanitation and dish machine worker. Inmate Vaduva is learning how all the positions contribute to the overall success of the department and works directly under my supervision. He also helps us with the preparation of all meals prepared in the Food Service Department at the Metropolitan Correctional Center (MCC NY). He is very professional at work, an extremely hard worker, and he puts all his efforts to get the job done in the given time. If you have any question please feel free to call me at (646)-836-6404.

Thank you for your time.

M. Charles, Cook Supervisor

*M. Charles*